



Brad Broker/Catie Coursen
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March 12, 2019

Certified Mail
Return Receipt Requested
7016 1370 0000 0848 9923

Attn: Compliance Technician
Air Quality Management Division
Alaska Department of Environmental Conservation
610 University Avenue
Fairbanks, Alaska 99709

Subject: Permit Deviation – Flowback Supporting Information Omission
Kuparuk Central Production Facility No.1
Permit No. AQ0267TVP01 Rev. 2, 8 August 2007

The ConocoPhillips Alaska, Inc. (COPA) Operating Report (OR) for the Kuparuk Central Production Facility #1 (CPF-1) reporting period ending September 30, 2018 errantly omitted flowback supporting information as required by the operating permit.

Please find the associated Permit Deviation Report for this omission attached. The missing information has been submitted to the Department under separate cover.

If you have any questions or need additional information regarding this report, please contact us at n1037@conocophillips.com or by phone at (907) 659-7242.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Broker/Catie Coursen'.

Brad Broker/Catie Coursen
Environmental Coordinator

Attachments

cc: Compliance Technician, Fairbanks

dec.aq.airreports@alaska.gov

Section 20. ADEC Notification Form

Fax this form to: (907) 451-2187

Telephone: (907) 451-5173

ConocoPhillips Alaska, Inc.

Company Name

Kuparuk Central Production Facility #1

Facility Name

Reason for notification:

☐ **Excess Emissions**

If you checked this box

Fill out section 1

☒ **Other Deviation from Permit Condition**

If you checked this box

fill out section 2

When did you discover the Excess Emissions or Other Deviation:

Date: 3/4/2019

Time: 16:30

Section 1. Excess Emissions

(a) Event Information (Use 24-hour clock):

START Time:

END Time:

Duration (hr:min):

Total:

(b) Cause of Event (Check all that apply):

☐ START UP

☐ UPSET CONDITION

☐ CONTROL EQUIPMENT

☐ SHUT DOWN

☐ SCHEDULED MAINTENANCE

☐ OTHER

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(c) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device

(d) Emission Limit Potentially Exceeded

Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.

Permit Condition	Limit	Emissions Observed

(e) Excess Emission Reduction:

Attach a description of the measures taken to minimize and/or control emissions during the event.

(f) Corrective Actions:

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?

YES NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

YES NO

Section 2. Other Permit Deviations

(a) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
56	N/A	Temporary Crude Oil Storage Tanks	N/A

(b) Permit Condition Deviation:

Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.

Permit Condition	Potential Deviation
42.3 The Permittee shall include with each operating report under condition 88: a. the monthly VOC emissions estimated in condition 42.2 at DS1E and DS1J and the 12 consecutive month VOC emissions, for each calendar month in the reporting period; b. the input and output from simulation models and software; and c. all calculations and assumptions used.	CPAI did not submit flowback simulation model inputs, outputs, and calculations and assumptions used in EU ID 56 VOC emission estimates reported in Attachment 7 of the 3Q 2018 operating report for flowbacks to temporary crude oil storage tanks that occurred in July and September 2018.
88.1 The operating report must include all information required to be in operating reports by other conditions of this permit.	CPAI did not include in the 3Q 2018 operating report the information required by Conditions 42.3b and 42.3c.
90 The Permittee must comply with each permit term and condition.	CPAI did not comply with each permit term and condition.

(c) Corrective Actions:

Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.

A supplement to the previously submitted 3Q 2018 operating report will be submitted to ADEC under separate cover.

Documentation for future well maintenance flowback events will more clearly identify the need for inclusion in the appropriate operating report.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Dennis Melton

Printed Name:



Signature:

3/12/2019

Date: